Office of Environmental Policy and Guidance Operating Plan Fiscal Year 2003

I. Introduction

a. Mission

As the Department's experts in identifying and resolving environmental policy and radiation protection issues, the Office of Environmental Policy and Guidance (EH-41) develops environmental policies, standards, guidance and associated tools to assist the Department in discharging its environmental and public protection responsibilities. In collaboration with Department of Energy (DOE) Program Offices, EH-41 also acts as the coordinator and advocate for DOE with other Federal agencies and national and international organizations in establishing environmental and public protection requirements. These functions support DOE's national security mission by promoting: 1) the protection of those communities and natural resources affected by DOE's research, development or production related operations; and 2) cost-effective external and internal environmental directives and regulations that support DOE's ability to develop and maintain the critical energy infrastructure and defense systems under the Department's purview.

b. Organization

The office consists of 34 employees. This includes an office director, two division directors, two secretaries, three administrative assistants and 26 professionals. The office is divided into two divisions; the Air, Water and Radiation Division and the RCRA/CERCLA Division. The Air, Water and Radiation Division has staff with expertise in areas such as, radiation protection (health physics), radioactive waste management with primary responsibility for fulfilling the mandates of areas such as the Atomic Energy Act of 1954, as amended, the Nuclear Waste Policy Act, and media-specific responsibility through the Clean Water Act (CWA), Safe Drinking Water Act (SDWA), and the Clean Air Act (CAA). The RCRA/CERCLA Division has subject matter experts in areas such as hazardous waste management, hazardous substance release response, natural resource damage assessment, environmental compliance and performance indicator reports, toxic chemical inventory reporting, and pollution prevention with primary responsibility for areas such as Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response Compensation and Liability Act (CERCLA), Toxic Substances Control Act (TSCA), Emergency Planning and Community Right-To-Know Act (EPCRA), and Pollution Prevention Act.

c. Purpose

The Office of Environment, Safety and Health (EH) mission, as defined in its draft June 2002 Strategic Plan is "to support the Department of Energy's missions by providing the corporate

infrastructure and technical resources that enable work to be performed in a safe, healthful, and environmentally sound manner." EH has established four goals to accomplish this mission. They are:

- Goal I. Streamlined ES&H policies, orders, standards, rules and guidance that communicate clear and consistent direction to DOE Headquarters and Field operations.
- Goal II. Accurate communication in a timely fashion to appropriate persons, of an assessment of ES&H impacts of DOE activities on its workers, affected communities, and the environment.
- Goal III. Corporate leadership for ES&H programs that protect workers, the public, the environment, and DOE's assets.
- Goal IV. Technically competent and highly motivated organization that is responsive to the DOE's mission and ES&H needs.

The purpose of this operating plan is to clearly identify the goals and objectives of EH-41 and the strategies to be used to accomplish them. In addition, the plan also identifies the performance measures (expected outcomes) that the office can use to determine if it successfully accomplished its goals and objectives. EH-41 has established six goals. They are:

- Goal I. Function as the Department's corporate resource for environmental expertise by providing technical assistance and support to DOE headquarters and field elements.
- Goal II. Assure that cost-effectiveness, technical feasibility, and flexibility are considered in the formulation of external environmental requirements and guidance by identifying, coordinating, and commenting on emerging rulemakings applicable to DOE operations.
- Goal III. Develop and provide to line management Departmental guidance on the interpretation and implementation of external environmental regulations, laws, executive orders and other directives.
- Goal IV. Establish protective standards for radiation protection of the public and the environment and guidance for meeting these requirements.
- Goal V. Represent and advocate DOE's interests in interagency, national and international environmental forums.
- Goal VI. Develop and issue policies, directives and guides related to DOE's responsibilities to protect its natural and cultural resources.

The EH-41 goals promote the overall EH mission and support all four goals of the EH draft strategic plan. The table below depicts how EH-41's operating plan goals support the EH strategic plan goals.

	EH G I	EH G II	EH G III	EH G IV
EH-41 G I	X		X	X
EH-41 G II	X		X	
EH-41 G III	X	X	X	X
EH-41 G IV		X	X	
EH-41 G V	X		X	X
EH-41 G VI	X	X	X	X

In Section II of this Operating Plan, each of EH-41's goals is subdivided into an objective or series of objectives as follows:

<u>GOAL I.</u> Function as the Department's corporate resource for environmental expertise by providing technical assistance and support to DOE headquarters and field elements.

Objective I-1. Review technical documents produced by the field and headquarters to ensure their accuracy and consistency with environmental regulations and DOE policy, and review the accuracy of documents on DOE environmental performance prepared by external organizations.

Objective I-2. Respond to inquiries from field and program offices, contractors, other Federal and State agencies, professional organizations and the public for scientific, regulatory compliance, and best practices information related to environmental protection policies and requirements applicable to DOE operations.

Objective I-3. Develop, maintain and continuously improve electronic tools and models, other methods, and compile data to facilitate field and headquarters compliance with environmental requirements and to meet the information needs of DOE elements.

Objective I-4. Lead and/or serve as technical experts on internal and external working groups, committees, etc. related to DOE environmental performance and compliance.

Objective I-5. Assist line management in developing approaches to addressing requirements in a manner that promotes cost-effective, compliant operations by DOE facilities.

Objective I-6. Assist and provide technical expertise on issues related to Homeland Security or DOE emergency response.

<u>GOAL II.</u> Assure that cost-effectiveness, technical feasibility, and flexibility are considered in the formulation of external environmental requirements and guidance by identifying, coordinating, and commenting on emerging external rulemakings applicable to DOE operations.

Objective II-1. Track emerging air, water, radiation, waste management, and resource management-related rulemakings and associated guidance documents to identify issues and provide comments to the originating Federal agency.

Objective II-2. Track emerging RCRA and CERCLA rulemakings, identify issues and provide comments to EPA.

Objective II-3. Track emerging TSCA rulemakings, identify issues and provide comments to EPA.

Objective II-4. Track emerging EPCRA rulemakings, identify issues and provide comments to EPA.

Objective II-5. Establish and implement an effective IMIS for the distribution of environmental and radiation protection information.

GOAL/OBJECTIVE III. Develop and provide to line management Departmental guidance on the interpretation and implementation of external environmental regulations, laws, executive orders and other directives.

<u>GOAL IV.</u> Establish protective standards for radiation protection of the public and the environment and guidance for meeting these requirements

Objective IV-1. Update Order DOE 5400.5 - Radiation Protection of the Public and the Environment.

Objective IV-2. Resolve issue regarding the 25 mrem per year and ALARA versus 10⁻⁴ to 10⁻⁶ lifetime risk.

Objective IV-3. Resolve issues regarding all pathways vs. separate groundwater standards and the application of drinking water standards to groundwater protection.

Objective IV-4. Address issues involving waste incidental to reprocessing and alternative disposal options for HLW and TRU waste.

Objective IV-5. Promote the safe and compliant management, release, and recycling of materials containing residual radioactivity.

Objective IV-6. Address under-utilization of DOE disposal facilities.

<u>GOAL V.</u> Represent and advocate DOE's interests in interagency, national and international environmental forums.

Objective V-1. Represent DOE on Interagency Committees, Workgroups, etc.

Objective V-2. Represent U.S. on International Committees, Working Groups, etc.

<u>GOAL VI.</u> Develop and issue policies, directives and guides related to DOE's responsibilities to protect its natural and cultural resources

Objective VI-1. Replace DOE Order 5400.1 with Order 450.1.

Objective VI-2. Issue Institutional Controls Policy.

Objective VI-3. Issue needed guidance.

The accomplishment of these more specific objectives will help EH-41 ensure that its overall goals are met. For each objective, a series of strategies are identified by which the Office plans to accomplish each objective. The due dates and expected outcomes for each strategy are presented. Some strategies are implemented on an as-needed basis, some are ongoing level-of-effort activities, and some are discrete projects. Section II delineates the strategies associated with each objective and its associated goal. These strategies are not ordered in accordance with their level of importance in accomplishing the objectives under which they are listed.

II. Plan for Accomplishing Mission

EH-41 GOALS

GOAL I. Function as the Department's corporate resource for environmental expertise by providing technical assistance and support to DOE headquarters and field elements

Objectives:

Objective I-1. Review technical documents produced by the field and headquarters to ensure their accuracy and consistency with environmental regulations and DOE policy, and review the accuracy of documents on DOE environmental performance prepared by external organizations

Strategies	Due Date	Expected Outcome
I-1.1: Support Yucca Mountain project on environmental standards issues and preparation of an Nuclear Regulatory Commission (NRC) license application	Periodic, as requested	Provision of advice to assure DOE positions are defensible and cost-effective; practices are compliant
I-1.2: Support EM's Order and Manual 435.1, <i>Radioactive Waste Management</i> assessment/revision effort	Ongoing	Incorporation of environmental perspective into Order/Manual requirements and improve cost-effectiveness.
I-1.3: In partnership with the Oak Ridge Operations Office, complete the Office of Environmental Management (EM) Stewardship pilot project on the application of DOE's graded approach to biota dose evaluation as a tool for monitoring an Oak Ridge Long-Term Stewardship (LTS) site.	February 2003	1) Improved approach for radiological protection of biota at DOE LTS sites 2) Improved collection and availability of environmental performance data.
I-1.4: Support DOE's National Environmental Policy Act (NEPA) Office by reviewing draft Environmental Impact Statements (EISs) for waste management, radiation protection and Clean Air Act general conformity issues (usually 3-6 EISs per year)	Periodic, as requested	Accurate environmental information in documents

I-1.5: Provide support in the development of an integrated Environment, Safety, and Health(ES&H) Reporting Order (revision of DOE Order 231.1 and 232.1 to one combined order).	January 2003	Streamlined and consolidated ES&H reporting order. Improved incorporation of internal and externally driven environmental reporting requirements and DOE performance data.
I-1.6: Review and validate CERCLA Federal Facilities Hazardous Waste Compliance Docket	Periodic, as requested	Accurate environmental information in documents
I-1.7: Review and validate Environmental Protection Agency (EPA) Quarterly Environmental Compliance Status Report	Periodic, as requested	Accurate environmental information in documents
I-1.8: Review and validate annual EPA Significant Noncompliance Data	Periodic, as requested	Accurate environmental information in documents
I-1.9: Review Occurrence Reporting Processing System (ORPS) Permit Exceedance Data for the Performance Indicator Effort	Periodic	Improved collection and/or availability of environmental performance data
I-1.10: Issue Summary Paper and Information Brief on Integration of Environmental Management Systems (EMSs) with Land Use Planning and Management Activities	12/31/02	Incorporation of environmental perspective/viewpoint
I-1.11: Support DOE's Office of General Counsel (GC) on CERCLA 5-Year Review Litigation	December 2002	Accurate environmental information in documents
I-1.12: Support EM on Small Sites Accelerated Cleanup and Closure; National Focus Project	December 2002	Accelerate site cleanup and closure

I-1.13: Assist EM on LTS Options Paper for Transferring EM Sites back to Program Secretarial Officers (PSOs)	October 2002	Improved understanding of environmental requirements
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Objective I-2. Respond to inquiries from field and program offices, contractors, other Federal and State agencies, professional organizations and the public for scientific, regulatory compliance, and best practices information related to environmental protection policies and requirements applicable to DOE operations

Strategies	Due Date	Expected Outcome
I-2.1: Conduct Annual Site Environmental Report (ASER) Workshop	October 2002 (next planned workshop October 2003)	Updated ASER reporting requirements, proposed changes and provide reporting and format recommendations to improve quality of ASERs across the DOE complex. Improved shared lessons learned in ASER production and dissemination of environmental information to the public
I-2.2: Assist with development or verification of authorized limits not requiring EH approval	Periodic, as requested by field or programs	Improved understanding of environmental requirements and improved radiation control and release limits. Improved assessments supporting release of property with residual radioactive material
I-2.3: Support development of the Recycling Programmatic Environmental Impact Statement (PEIS)	Ongoing	Provision of technical support for Departmental policy on metals recycling

I-2.4: Support the Hanford Site Land Clearance Team in its biota dose assessment of the "Arid Land Ecology Reserve"	Periodic, as requested	Improved implementation of environmental requirements Demonstration that evaluated lands pose no radiological risk to the environment leading to U.S. Fish and Wildlife Service acceptance of land for transfer.
I-2.5: Review and comment on draft guidance documents developed by the National Council for Radiation Protection and Measurements (NCRP)	Periodic, as requested	Transmittal of DOE positions and technical input on draft documents prepared by national radiation protection organization.
I-2.6: Support field in interpreting and implementing regulatory requirements for radioactive waste management and cleanup	Periodic, as requested	Improved understanding of environmental requirements; compliant environmental performance
I-2.7: Provide technical and regulatory information and advice to the GC concerning radioactive waste management and cleanup in support of GC document reviews and DOE positions in litigation	Periodic, as requested	Compliant and defensible DOE practices
I-2.8: Support/review LTS documents; participate in various EM LTS work groups and coordinating committees	Ongoing	Incorporate DOE-wide environmental perspective into, and help improve accuracy of EM-generated LTS documents.
I-2.9: Hold Annual Radionuclide National Emission Standards for Hazardous Air Pollutants (NESHAPs) Meeting	Annually (next meeting June 2003)	Improved understanding of environmental requirements and improved collection of air emissions data.
I-2.10: Co-host DOE Cultural Resources Forum	May 2003	Improved understanding of cultural resource requirements, information exchange, compliance strategies development, and issue identification

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I-2.11: Coordinate the Department's response to the Department of Interior annual Federal Archeological Activities Questionnaire	March 2003	Improved collection and/or availability of environmental performance data
I-2.12: Support implementation of the DOE Indian Policy to ensure consistency with cultural resources policy (DOE Policy 141.1)	Ongoing	Improved understanding and increased awareness of DOE's cultural resources management responsibilities
I-2.13: Summarize data on DOE-wide ground water monitoring programs	June 2003	Improved collection and availability of environmental performance data
I-2.14: Organize and lead ground water program technical peer reviews	Periodic, as requested by field	Improved environmental performance and sharing of lessons learned
I-2.15: Participate in EM's high-level waste (HLW) tank workshop	Winter 2002	Incorporation of environmental perspective/viewpoint
I-2.16: Support EM on the Draft Institutional Controls Plan for Hanford and EPA Region X Policy	February 2003	Accelerated cleanup effort
I-2.17: Support Paducah to update status of 5-year review on EPA's report to Congress	October 2002	Compliant environmental performance
I-2.18: Support performance of EMS audits	Periodic, as requested	Improved environmental compliance. Improved implementation of EMSs
I-2.19: Support EH-5 Chemical Safety Topical Committee Project 2002-C "Current Chemical Hazard Characterization;" Project 2002 "Regulatory Roadmaps;" Project 2002 "Pollution Prevention" Chapter; and Project 2002 "EMS"	Periodic, as requested	Incorporation of environmental perspective/viewpoint Improved understanding of environmental requirements
I-2.20: Support Oak Ridge Operations (ORO) on Weldon Springs Natural Resource Damage Assessment (NRDA)	Periodic, as requested	Improved Integration of Environmental Restoration and NRDA documentation

I-2.21: Support ORO on Paducah NRDA	Periodic, as requested	Improved Integration of Environmental Restoration and NRDA documentation
I-2.22: Support Richland Operations Office (RLO) on Hanford NRDA	Ongoing	Improved understanding of environmental requirements
I-2.23 : Support Albuquerque Operations Office (ALO) on South Valley NRDA	Periodic, as requested	Improved understanding of environmental requirements
I-2.24: Support Savannah River Site (SRS) on Natural Resource Trustee Outreach	Ongoing	Integrated Environmental Restoration and Natural Resource Damages documentation
I-2.25: Support Idaho Operations Office (IDO) on Ecological Management Plan	Periodic, as requested	Sharing of Ecological Management Plan Lessons Learned
I-2.26: Support Rocky Flats on Wetlands Guidance at National Priorities List (NPL) Sites	Ongoing	Input to Rocky Flats position on Wetlands–Solid Waste Agency of Northern Cook County (SWANCC) Rule or CERCLA Cleanup
I-2.27: Coordinate DOE Participation in EPA National Environmental Performance Track System	Ongoing	Improved environmental performance
I-2.28: Support EPA RCRA Corrective Action Showcase DOE Participation Pilot	Ongoing	Improved understanding of environmental requirements
I-2.29: Support EM-54 in Innovation Technology Deployment (Rocky Flats and Ohio Closure Sites)	Ongoing	Accelerated site cleanup and closure
I-2.30: Develop Plan on EH support to EM on Risk-Based Decisionmaking	3 rd Quarter FY 2003	Compliant and cost- effective environmental performance
I-2.31: Support EM Development of CERCLA Five-Year Review Annual Report to Congress	Ongoing	Accurate environmental information in documents

I-2.32: Develop Issue Paper on Ramifications of EPA/ Navy Agreement to Retroactively Apply TSCA Cleanup Rule on Transfer of polychlorinated biphenyls (PCB)-contaminated facilities	Ongoing	Improved understanding of environmental requirements
I-2.33: Support EM-3 on Environmental Compliance for Quarterly Performance Measures	Periodic, as requested	Improved collection and/or availability of environmental performance data
I-2.34: Support on Pollution Prevention to Chemical Management Team under Joint DOE and Energy Facility Contractors Operating Group (EFCOG)	06/31/03	Incorporation of environmental perspective/viewpoint Improved understanding of
		environmental requirements
I-2.35: Review and provide comments on EPA Policy Memorandum and TSCA Chem Waste Landfill Authorization Application: Alternate Disposal Approval for Transuranic (TRU)/PCB Waste at Waste Isolation Pilot Plant (WIPP)	Ongoing	Accurate environmental information in documents Improved understanding of environmental requirements
I-2.36: Participate in EPA Strategic PCB Mgt Workshops at Hanford and SRS	4 th Quarter FY 2003	Improved understanding of environmental requirements
I-2.37: Support EPA/DOE Conference Call Solidification of IDO PCB Waste and Enforcement Discretion Consideration	Ongoing	Improved understanding of environmental requirements
I-2.38: Support EH-3 in Review of ES&H Performance Indicators	Quarterly	Accurate environmental information in documents
I-2.39: Support EM-34 to identify ARAR for TRU Waste at Idaho	Ongoing	Compliant and cost- effective environmental performance
I-2.40: Co-Chair EM Technology Information Exchange (TIE) Workshop Session on EM Risk Reduction	2 nd Quarter FY 2003	Accelerated site cleanup and closure
I-2.41: Serve as DOE Contact for EFCOG EMS Subgroup (of the Integrated Safety Management (ISM) Workgroup)	Ongoing	Improved DOE-wide implementation of EMS

I-2.42: Support EM-52 on Environmental Management Science Program "Relevance Review" of Subsurface Contaminants in the Vadose and Saturated Zones	9/30/03	Peer Review of Project Proposals
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Objective I-3. Develop, maintain and continuously improve electronic tools and models, other methods, and compile data to facilitate field and headquarters compliance with environmental requirements and to meet the information needs of DOE elements

Strategies	Due Date	Expected Outcome
I-3.1: Support to EPA/Office of Solid Waste and Emergency Response (OSWER) on Site Conceptual Model Builder	Ongoing	Improved understanding of environmental requirements
I-3.2: Support to DOE Los Alamos Area Office (LAAO) on Site Conceptual Model Builder	Ongoing	Improved understanding of environmental requirements
I-3.3: Maintain current Notice of Violations (NOV) Database and post on Website	Ongoing	Improved availability of environmental performance data
I-3.4: Promote application of Principles of Environmental Restoration Optimization in Design and Implementation at SRS/Albuquerque Operations Office (ALO)	Periodic, as requested	Accelerated site cleanup
I-3.5: SRS Instruction on Application of Environmental Restoration Principles	1st Quarter FY 2003	Accelerated site cleanup
I-3.6: Support DOE/EPA (Federal Facilities Restoration and Reuse Office (FRRO) and Reg IV) Federal Facilities Remediation Training for ORO	1st Quarter FY 2003	Accelerated site cleanup
I-3.7: Develop and implement Integrated Management Information System (IMIS)	Ongoing	Improve Office advocacy role and provide cost-effective electronic access to EH- 41 environmental and radiation protection information

I-3.8: Participate in the Administration's e-Government initiative	Ongoing	Improved access to environmental information through development of a webbased government-wide profiler
I-3.9: Coordinate development of and submittal of Annual Progress Report Executive Order (EO)13148, "Greening the Government Through Leadership in Environmental Management"	3/30/03	Collection and availability of environmental performance data
I-3.10: Provide technical support to EM regarding RCRA Regulatory Initiatives and Options for Mixed High-Level Wastes	Ongoing	Development of viable treatment and disposal pathways
I-3.11: Inventory of State-sponsored P2 support and Awards Programs	Annually	Shared Lessons Learned
I-3.12: Coordination of pollution prevention awards and recognition program	04/22/03	Shared Lessons Learned
I-3.13: Support on DOE-wide training on Order 450.1, "Environmental Protection Program"	March 2003	Enhanced compliance with P2 requirements of Order 450.1
I-3.14: Support EM Site Closure Webpage	April 2003	updated website which corresponds with the EH-41 website
I-3.15: Prepare EH-41 Annual Performance Report	Ongoing	Issuance of a GPRA- responsive report on EH-41 activities and increase access to information on EH-41 activities and documents.
I-3.16: Maintain current "Air Quality Designations and Classifications for Areas with DOE Facilities" table on the EH-41 website	Ongoing	Updated information on the compliance status of DOE sites with the NAAQs for the six criteria pollutants

I-3.17: Maintain current endangered and threatened species database on EH-41 website.	Ongoing	Up-to-date listings and/or delisting of Federally endangered and threatened species on DOE properties.
I-3.18: Develop and maintain ground water focus area on EH-41 website	Ongoing	Up-to-date information on ground water protection to DOE
I-3.19: Maintain Site Environmental Information Handbook	Ongoing	Up-to-date environmental information to the DOE community and the public
I-3.20: Maintain Total Maximum Daily Load (TMDL) Coordinating Group webpage	Ongoing	Improved understanding of environmental requirements and incorporation of environmental perspective/viewpoint
I-3.21: Maintain Cultural Resources webpage	Ongoing	Improved understanding of environmental requirements and incorporation of environmental perspective/viewpoint
I-3.22: Maintain National Pollutant Discharge Elimination System (NPDES) database and post on website	Ongoing	Improved collection and availability of environmental performance data.
I-3.23: Prepare NESHAPs 40 CFR Part 61 Subpart H DOE Summary Report	Annually; resume with 5 year report Dec. 2002	Improved understanding of environmental requirements and environmental performance data
I-3.24: Maintain Authorized Limits Exemptions (ALEX) database	Ongoing	Improved collection and availability of environmental performance data.

I-3.25: Lead the inter-agency (DOE; EPA; NRC) development of the RESRAD-BIOTA computer code (beta version 2) for evaluating radiation doses to biota.	Spring 2003	Interagency consensus-based computer code. Compliant environmental performance. Shared lessons learned. Cost savings.
I-3.26: Support the development of the RESRAD dose and risk assessment code.	Ongoing	Compliant environmental performance. Shared lessons learned. Cost savings.
I-3.27 Support the development of the RESRAD-BUILD building dose assessment code.	Ongoing	Compliant environmental performance. Shared lessons learned. Cost savings.
I-3.28: Support the development of the RESRAD-OFFSITE dose assessment code.	Ongoing.	Compliant environmental performance. Shared lessons learned. Cost savings.
I-3.29: Support the development of the RESRAD-RECYCLE code for management and release of materials.	Deferred pending PEIS decision	Compliant environmental performance. Shared lessons learned. Cost savings.

I-3.30: Participate in the Interagency Steering Committee on Radiation Standards (ISCORS) Cleanup Subcommittee's initiative to develop an electronic catalog of environmental parameters used in dose and risk assessment and modeling tools.	Ongoing	Compliant environmental performance. Shared lessons learned. Cost savings.
I-3.31: Update and maintain the Biota Dose Assessment Committee (BDAC) web site to provide committee member and public access and dissemination of DOE, national, and international methods and guidance on radiation protection of the environment (biota and ecosystems).	Semi-annually, as required	Shared lessons learned. Compliant environmental performance.
I-3.32: Update and maintain the DOE Dose and Risk Assessment focus area web page to provide DOE and public access and dissemination of DOE dose and risk assessment tools, models, policy and guidance.	Semi-annually, as required	Shared lessons learned. Improved communication and awareness of DOE's dose and risk assessment initiatives and guidance.
I-3.33: Update and maintain the Control and Release of Materials focus area web page	Periodic, as needed	Shared lessons learned. Improved communication and awareness of DOE's policy, guidance, and tools for the management and release of property containing residual radioactive materials.
I-3.34: Assure that the information developed by EH-41 is consistent with recent Office of Management and Budget (OMB) Data Quality Guidelines	1 st Quarter FY 2003	Accurate environmental information contained in Office documents, consistent with OMB guidelines.

I-3.35: Support IM-1 on Federal Emergency Management Agency (FEMA) Disaster Help Portal development, including requesting broader DOE program and field participation for additional input data.	Ongoing	Support of national defense and emergency preparedness efforts. Support of Administration's e-government initiatives.
I-3.36: Hold a training workshop for DOE program and sites on requirements, methods and guidance for demonstrating compliance with DOE's requirements for radiation protection of biota.	September 2003	Improved implementation of environmental requirements. Shared lessons learned. Improved coordination and consensus regarding the use of common tools (RESRAD-BIOTA) within DOE and across Federal agencies.
I-3.37: Support on DOE-wide training workshop on Order 450.1, "Environmental Protection Program"	March 2003	Enhanced compliance with P2 requirements of Order 450.1

Objective I-4. Lead and/or serve as technical experts on internal and external working groups, committees, etc. related to DOE environmental performance and compliance

Strategies	Due Date	Expected Outcome
I-4.1: Conduct DOE Ground Water Protection Work Group	Ongoing	Compliant environmental performance and sharing of lessons learned
I-4.2: Participate on EM Scrap Metal PEIS Project Team	Ongoing	Technical adequacy and defensible decision

I-4.3: Co-chair DOE TMDL Coordinating Group	Ongoing	Proposals for cost- effective changes to environmental protection requirements
I-4.4 : Participate on the DOE Low-Level Waste Federal Review Group (LFRG).	Ongoing	Representation of EH's position within DOE
I-4.5: Serve as the designated EH Indian Issues Point of Contact	Ongoing	Representation of DOE's position to other organizations
I-4.6: Participate in the State and Tribal Government Working Group	Ongoing	Representation of DOE's position to other organizations
I-4.7: Participate in the Federal Preservation Training Forum	Ongoing	Representation of DOE's position to other organizations
I-4.8: Participate in EH Homeland Safety Planning Project to develop a plan to deal with new, post-9/11 challenges facing DOE.	Ongoing	Representation of EH's position within DOE
I-4.9: Participate on DOE land disposal restrictions (LDR) Revisions Workgroup	Ongoing	Representation of EH's position within DOE
I-4.10: Chair DOE EPCRA Toxic Release Inventory (TRI)I Focus Group	Monthly	Shared lessons learned
I-4.11: Validation of TRI Form Rs Reporting Year 2002, update database and transfer data to EM Central Information Database	4 th Quarter FY 2003 thru 1 st Quarter FY 2004	Compliant environmental performance
I-4.12: Participate in DOE Pollution Prevention Coordinators Conference Call	Monthly	Assistance in development of waste reduction programs
		Coordination of DOE field waste reduction efforts

I-4.13: Coordinate with the Conference of Radiation Control Program Directors (CRCPD) E-5 Committee, Association of State and Territorial Solid Waste Management Officials (ASTSWMO) and EPA to effectively factor work from Radiological Control Criteria study into EPA rulemaking	During CY 2003	Incorporation of environmental perspective; harmonized radiation protection requirements
I-4.14: Participate on EM sponsored State and Tribal Government Workgroup	Ongoing	Representation of DOE's position to other organizations
I-4.15: Participate on DOE TMDL Focus Group	Ongoing	Representation of EH's position within DOE
I-4.16: Participate in Chemical User Safety and Health Requirements (CUSHR) Roadmap Team	Ongoing	Representation of EH-4 position
I-4.17: Participate in DOE Focus Group on RCRA Corrective Action Environmental Indicators	Ongoing	Representation of EH-4 position within DOE
I-4.18: Participate in DOE Environmental Restoration Site Closure WorkGroup	Ongoing	Development of a consistent site closure policy
I-4.19: Chair DOE Natural Resource Trustee Steering Committee	Ongoing	DOE Complex-wide NRDA Coordination Compliant implementation of environmental requirements
I-4.20: Chair DOE PCB Focus Group	Ongoing	Represent EH's position within DOE
I-4.21: Participate on DOE HLW/RCRA Issues Work Group	Ongoing	Representation of EH's position within DOE
I-4.22: Serve as the Headquarters liaison for EPA Sector Facility Index Program	Ongoing	Accurate environmental information in public documents

I-4.23: Chair the Pollution Prevention Coordinator's Conference Call	Monthly	Shared Lessons Learned Improved understanding of environmental requirements
I-4.24: DOE Affirmative Procurement Program (APP) Green Acquisition Advocates Conference Call	Quarterly	Shared Lesson Learned Improved understanding of environmental requirements
I-4.25: Support Joint Stewardship Project	Ongoing	Improved understanding of environmental requirements accurate environmental information in documents
I-4.26: Chair the DOE-wide Biota Dose Assessment Committee ((BDAC), a DOE Technical Standards Topical Committee).	Ongoing	Improved understanding of environmental requirements. Shared lessons learned for improving DOE's methods and guidance on biota protection. Technical assistance to DOE programs and sites regarding compliance with DOE's biota dose rate guidelines.

I-4.27: Participate in Interagency Work Group on EMSs	Ongoing	Representation of DOE's position Enhanced expertise to assist with DOE implementation
I-4.28: Chair DOE EMS Topical Committee	Ongoing	Improved understanding of Environmental Management System (EMS) requirements. Technical assistance in the implementation of EMS at DOE sites. Technical assistance in the implementation of Executive Order 13148 and DOE Order 450.1

Objective I-5. Assist line management in developing approaches to addressing requirements in a manner that promotes cost-effective, compliant operations by DOE facilities

Strategies	Due Date	Expected Outcome
I-5.1: Preparation of Radioactive Lead Solids Variance Petition	3 rd quarter, FY 2003	Alternate treatment pathway and cost savings
I-5.2: Conduct Low-level Waste Exemption Request consultations	Ongoing	Improved understanding of environmental requirements

I-5.3: Conduct Authorized Limits Release reviews	Ongoing	Improved understanding of environmental requirements. Protective radiation control and release limits.
I-5.4: Provide EH perspective on LFRG policies and guidance, and Order DOE 435.1 implementation	Ongoing	Incorporation of environmental perspective
I-5.5: Support site waste incidental to reprocessing determinations.	Periodic, as requested	Improved understanding of environmental requirements
I-5.6: Support Lawrence Berkeley National Laboratory (LBNL) and EM-TRU Mixed Waste Technologies Group on Tritiated Organic Waste Treatment Issue	1st Quarter FY 2003	Compliant treatment and disposition pathway
I-5.7: Provide support on Treatment Variance for Mixed Waste Batteries	November 2002	Viable treatment pathway and significant cost savings
I-5.8: Provide support on Treatment Variance for Solid Lead Wastes	September 2003	Viable treatment pathway and significant cost savings

Objective I-6. Assist and provide technical expertise on issues related to Homeland Security or DOE emergency response

I-6.1: Provide technical support for DOE emergency response exercises and drills.	Ongoing	Incorporation of ES&H requirements and perspective.
I-6.2: Provide technical support for Homeland Safety planning activities.	Ongoing	Incorporation of ES&H requirements and perspective.

GOAL II. Assure that cost-effectiveness, technical feasibility, and flexibility are considered in the formulation of external environmental requirements and guidance by identifying, coordinating, and commenting on emerging external rulemakings applicable to DOE operations

Objectives:

Objective II-1. Track emerging air, water, radiation, waste management, and resource management-related rulemakings and associated guidance documents to identify issues and provide comments to the originating Federal agency.

Strategies	Due Date	Expected Outcome
II-1.1: Comment on EPA proposed Total Maximum Daily Load/Watershed rule	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements
II-1.2: Track and, and as appropriate, comment on EPA CAA proposed rule, "NESHAP: Industrial, Commercial and Institutional Boilers and Process Heaters"	2 nd Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements
II-1.3: Track and, as appropriate, comment on EPA CAA proposed rule, "Inspection/Maintenance Program Requirements for Federal Facilities; Amendment to the Final Rule"	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements
II-1.4: Track and, as appropriate, comment on EPA CAA proposed rule, "New Source Review Routine Maintenance, Repair, and Replacement"	2 nd quarter, FY 2003	Transmittal of DOE position on proposed regulatory requirements

II-1.5: Track and, as appropriate, comment on the approximately 17 additional CAA rules expected to be proposed by EPA during FY 2003	Ongoing	Identification of proposed environmental regulations of interest to DOE; transmittal of DOE position on proposed regulatory requirements
II-1.6: Track and, as appropriate, comment on revisions to SDWA drinking water standards for radon and radionuclides	Ongoing	Identification of proposed environmental regulations of interest to DOE; transmittal of DOE position on proposed regulatory requirements
II-1.7: Comment on EPA NPDES related rulemakings and guidance (4 actions)	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements.
II-1.8: Comment on EPA Total Maximum Daily Load related rulemakings and guidance (3 actions)	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements.
II-1.9: Comment on EPA proposed Effluent Guidelines for various industries (5 actions)	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements.
II-1.10: Comment on EPA proposed Test Procedures for the Analysis of Mercury under the CWA (Method 245.7)	NPRM Dec. 2002 and Final Dec. 2003	Transmittal of DOE position on proposed regulatory requirements.
II-1.11: Comment on EPA proposed NPDES permit requirements for municipal sanitary sewer collection systems, municipal satellite collection systems, and sanitary sewer overflows	NPRM Dec. 2002	Transmittal of DOE position on proposed regulatory requirements.
II-1.12: Comment on proposed CWA definition of Waters of the United States	December 2002	Transmittal of DOE position on proposed regulatory requirements.
II-1.13: Comment on various general CWA regulations and guidance (4 actions)	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements.

Objective II-2. Track emerging RCRA and CERCLA rulemakings, identify issues and provide comments to EPA

Strategies	Due Date	Expected Outcome
II-2.1: Comment on EPA Proposed Land Use Control Program Guidance on Implementation, Monitoring and Enforcement of Institutional Controls	9/30/03	EPA Implementation Guide for Institutional Controls reflecting DOE issues
II-2.2: Comment on Notice of Proposed Rulemaking (NPRM) Department of Interior Natural Resource Damage Assessment Rule 43 CFR 11 Reproposal	Ongoing	Transmittal of DOE position on proposed regulatory requirements
II-2.3: Comment on NPRMs for CERCLA National Priorities List for Uncontrolled Hazardous Waste Sites	Periodic	Transmittal of DOE position on proposed regulatory requirements
II-2.4: Comment on EPA Draft RCRA Corrective Action EI Ground/Surface Water Indoor Air Guide	02/27/03	Transmittal of DOE position on draft guidance
II-2.5: Comment on EPA Draft RCRA/CERCLA Guidance on Innovative Containment Barriers	Periodic	Transmittal of DOE position on regulatory guidance
II-2.6: Comment on EPA Draft Guidance on Brownfields Redevelopment Funding at RCRA Sites	Withdrawn	Transmittal of DOE position on regulatory guidance
II-2.7: Comment on Notice of Data Availability (NODA) regarding Mercury Treatability Studies	2 nd Quarter FY 2003	Transmittal of DOE position on NODA
II-2.8: Comment on NPRM Modification to RCRA Rules for Solvent-Contaminated Shop Towels and Wipes	3 rd Quarter FY 2003	Transmittal of consolidated DOE comments to EPA
II-2.9: Track EPA Proposal to Grant delisting and determination of equivalent treatment (DET) petition for certain Lawerence Berkeley National Laboratory Mixed Waste	Ongoing	Compliant treatment and disposal pathway

II-2.10: EPA definition of a Solid Waste Workgroup proposed guidance on criteria to determine whether certain types of hazardous waste recycling are legitimate	Periodic	Transmittal of DOE position on regulatory guidance
II-2.11: Comment on NPRM on Re-Definition of Solid Waste and Recycling: Streamlined Permits for Off-Site Recyclers; Product Stewardship Arrangements; Identification of "Commodity-Like" Materials, and Relaxed Storage Requirements	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements
II-2.12: Comment on NPRM Facility Identification Initiative Rule	4 th Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements
II-2.13: Comment on NPRM on Revision of Waste Water Treatment Exemptions for Hazardous Waste Mixtures (Mixture and Derived-From Rule)	3 rd Quarter, FY 2003	Transmittal of DOE position on proposed regulatory requirements
II-2.14: Comment on NPRM Hazardous Waste Combustor Phase II Boilers and Industrial Furnaces	1st Quarter FY 2003	Transmittal of DOE position on proposed regulatory requirements
II-2.15: Comment on NPRM Proposed Revisions to SW-846	1/30/03	Transmittal of consolidated DOE comments to EPA
II-2.16: Comment on EPA Definition of a Solid Waste Workgroup Proposed Guidance on Criteria to Determine whether Certain Types of Hazardous Waste Recycling are Legitimate (i.e. clarify existing policy on "sham" recycling)	Pending	Transmittal of consolidated DOE comments to EPA
II-2.17: Comment on EPA Draft Guidance: Institutional Controls: Implementation, Monitoring and Enforcement of Institutional Control at Superfund Sites and RCRA cleanups	10/31/02	Transmittal of consolidated DOE comments to EPA

II-2.18: Track NPRM Cross Media and Electronic Reporting and Recordkeeping Rule	Ongoing	Transmittal of DOE position on proposed regulatory requirements
II-2.19: Track NPRM Hazardous Waste Identification Rule (HWIR): Identification and Listing of Hazardous Wastes	Ongoing	Identification of proposed environmental regulations of interest to DOE
II-2.20: Track Advance Notice of Proposed Rulemaking on Potential Revisions to Mercury LDR Treatment Standards	Ongoing	Identification of proposed environmental regulations of interest to DOE
II-2.21: Track NPRM on RCRA permit status of Ortho-McNeil Project XL On-Site Treatment of Low Level Mixed Wastes	4 th Quarter, FY 2003	Identification of final environmental regulations of interest to DOE
II-2.22: Track NPRM LDR Treatment Std. K088 Waste/Classification of Vitrification Units	Ongoing	Identification of proposed environmental regulations of interest to DOE
II-23: Comment on NPRM regarding Increase Metals Reclamation from F006 Waste Streams	Ongoing	Transmittal of DOE position on proposed regulatory requirements

Objective II-3. Track emerging TSCA rulemakings, identify issues and provide comments to EPA

Strategies	Due Date	Expected Outcome
II-3.1: Review and provide DOE comments on NPRM TSCA PCBs; Use Authorizations	~	Transmittal of DOE position on proposed regulatory requirements

II-3.2: Review and provide comments on NPRM TSCA Non-Liquid PCB Rule	-	Transmittal of DOE position on proposed regulatory requirements
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Objective II-4. Track emerging EPCRA rulemakings, identify issues and provide comments to EPA

Strategies	Due Date	Expected Outcome
II-4.1: Comment on NPRM EPCRA: Reporting Amendments and Streamlining Rule	Pending	Transmittal of DOE position on proposed regulatory requirements
II-4.2: Comment on NPRM on EPCRA Section 312 Annual Inventory Reporting Burden Reduction for Minimal Haz/Risk Substances	Pending	Transmittal of DOE position on proposed regulatory requirements
II-4.3: Comment on NPRM EPCRA TRI; Review of Chemicals on the Original TRI List	Pending	Transmittal of DOE position on proposed regulatory requirements
II-4.4: Comment on NPRM EPCRA TRI; Revisions to the Otherwise Use Activity Exemptions	Pending	Transmittal of DOE position on proposed regulatory requirements
II-4.5: Comment on NPRM EPCRA Change TRI Reporting Requirements From Standard Industrial Classification (SIC) Codes to North American Industrial Classification System	Pending	Transmittal of DOE position on proposed regulatory requirements

Objective II-5. Establish and implement an effective IMIS for the distribution of environmental and radiation protection information

Strategies	Due Date	Expected Outcome
II-5.1: Develop Federal Register Digest summary of applicable environmental regulatory activities	Ongoing	Identification of proposed environmental regulations of interest to DOE. Access to information on Office activities and documents.
II-5.2: Post all EH-41 office memoranda and EH-41 Weekly Reports	Ongoing	Access to information on Office activities and documents.

GOAL/OBJECTIVE III. Develop and provide to line management Departmental guidance on the interpretation and implementation of external environmental regulations, laws, executive orders and other directives

Strategies	Due Date	Expected Outcomes
III-1.1: Conduct analysis regarding "Plans for Plans" item, "Consistent Environmental Regulatory Compliance Framework" and prepare guidance as appropriate	12/31/02 (issue paper)	Shared lessons learned, cost savings
III-1.2: Issue guidance on final SDWA drinking water standard for radon	3 rd Quarter FY 2003	Compliant environmental performance
III-1.3: Notify DOE elements and prepare guidance on EPA CAA final rule, "New Source Review (NSR) Improvement"	2 nd Quarter FY 2003	Compliant environmental performance
III-1.4: Notify DOE elements and prepare guidance on EPA final rule, "Amend Subpart H and I, 40 CFR Part 61, for Emissions of Radionuclides Other Than Radon From DOE Facilities"	Spring 2003	Compliant environmental performance and cost avoidance.

III-1.5: Notify DOE elements and prepare guidance on the approximately 12 additional EPA CAA regulations applicable to DOE operations, which are expected to be promulgated during FY 2003	Ongoing	Compliant environmental performance
III-1.6: Notify DOE elements of other CAA-related Federal Register notices and rulemakings that may be of some relevance to DOE operations	Ongoing, issued on bimonthly basis	Compliant environmental performance
III-1.7: Prepare and issue guidance on other CAA-related issues identified during FY 2003	Periodic, as identified	Compliant environmental performance and shared lessons learned
III-1.8: Prepare Summary Reports of DOE-Wide Radiological Releases and Doses.	Ongoing (1999- 2001 Summary Report expected in Spring 2003)	Confirmation of compliant environmental performance for radiological releases and doses from operations at DOE sites.
III-1.9: Prepare NRDA/Environmental Restoration Integration Policy Implementation Lessons Learned Report	9/30/03	Shared lessons learned
III-1.10: Develop Model Work Plan for Principles of Facility Disposition Optimization	9/30/02	Compliant environmental performance, cost savings
III-1.11: Prepare Modification Hazardous Waste Manifest System Regulatory Bulletin	60 Days after final rule	Compliant environmental performance
III-1.12: Prepare InfoMap on EPA CERCLA Probabilistic Risk Assessment Guidance	9/30/03	Compliant environmental performance
III-1.13: Prepare InfoMap on EPA's CERCLA Background Characterization Guidance OSWER 9285.6-07P	9/30/03	Compliant environmental performance
III-1.14: Expand Environmental Standards Webpage	Periodic, as necessary	Accurate and up-to-date environmental information/environmental compliance tool

III-1.15: Prepare Options for Improved Handling Waste Web-based Guide	1 st Quarter FY 2003	Compliant environmental performance
III-1.16: Update Corrective Action Management Unit (CAMU) and Temporary Units InfoBrief	10/09/02	Compliant environmental performance
III-1.17: Update corrective measures study/stabilization initiative info. briefs, and HWIR-media Regulatory Bulletin	10/23/02	Compliant environmental performance
III-1.18: Update Management of Remediation Wastes, Federal Facility Compliance Act Info. briefs	10/25/02	Compliant environmental performance
III-1.19: Update RCRA Controls for Wastewater Treatment Units Regulatory Bulletin	9/30/03	Compliant environmental performance
III-1.20: Maintain Principles of Environmental Restoration Optimization Fact Sheet and Case Studies Compendium	Ongoing	Accelerated site cleanup and closure
III-1.21: Develop Internet-Based Instruction on the Principles of Environmental Restoration Optimization	Ongoing	Accelerated site cleanup and closure
III-1.22: Prepare Environmental Restoration Surface Barrier Reference Guide	Ongoing	Accelerated site cleanup and closure
III-1.23: Prepare Compliant Environmental Restoration Design and Implementation Lessons-Learned Fact Sheet	Ongoing	Accelerated site cleanup and closure
III-1.24: Prepare Joint Mound/EH-413/EM-51 Uncertainty Management in Environmental Restoration O & M and LTS Lessons-Learned Fact Sheet	Ongoing	Accelerated site cleanup and closure
III-1.25: Develop Site Closure Guidance and Site Closure Web Page in Collaboration with EM-30 and Oakland Operations Office	Ongoing	Field access to Web-based guidance for CERCLA Closure

III-1.26: Prepare RCRA Subpart X Requirements Info Brief	3 rd Quarter FY 2003	Compliant implementation of environmental regulations
III-1.27: Prepare RCRA Hazardous Waste LDR Storage and Treatment in Containment Bldg Info Brief	4 th Quarter FY 2003	Compliant implementation of environmental regulations
III-1.28: Prepare LDR Treatment Standards Applicability to Residues from Treating Characteristic Waste Flowchart Guide	2 nd Quarter FY 2003	Compliant implementation of environmental regulations
III-1.29: Provide Technical Editorial Review and Posting of 1) Scrap Metal Information Brief, 2) LDR Phase IV May 97 Regulatory Bulletin, and 3) LDR Phase III Regulatory Bulletin	4 th Quarter FY 2003	Compliant implementation of environmental regulations
III-1.30: Prepare Spent Solvent Waste F001-F005 Classification Draft Guide	4 th Quarter FY 2003	Compliant implementation of environmental regulations
III-1.31: Prepare Waste Batteries Management Alternatives Web-based guide (Options for Handling Selected Waste Streams under RCRA)	2 nd Quarter FY 2003	Compliant implementation of environmental regulations
III-1.32: Prepare Mixed Waste Storage, Treatment, Transportation and Disposal Rule Regulatory Bulletin	3 rd Quarter FY 2003	Compliant implementation of environmental regulations
III-1.33: Prepare HWIR Revisions to Mixture and Derived-From Rules Regulatory Bulletin	4 th Quarter FY 2003	Compliant implementation of environmental regulations
III-1.34: Prepare RCRA R&D Permits Info Brief	4 th Quarter, FY 2003	Compliant implementation of environmental regulations
III-1.35: Prepare Project XL Ortho-McNeil Pharmaceutical (LL-Tritiated Organic Waste) InfoMap	4 th Quarter FY 2003	Timely reporting of environmental information
III-1.36: Update Obtaining Variance from LDR Treatment Standards Guide	4 th Quarter FY 2003	Compliant implementation of environmental regulations

III-1.37: Prepare LDR Treatment Standards Overview Info Brief	2 nd Quarter FY 2003	Compliant implementation of environmental regulations
III-1.38: Prepare LDR Waste Analysis and Recordkeeping (Notification/Certification) Guide Update	4 th Quarter FY 2003	Compliant implementation of environmental regulations
III-1.39: Update guide on RCRA Post-Closure Permits, DOE/EH-231-021/0593	3/31/03	Compliant implementation of environmental regulators
III-1.40: Update Federal Environmental Permitting Handbook	2/28/03	Compliant implementation of environmental regulations
III-1.41: Update RCRA Corrective Action Program Guide (Interim), DOE/EH-0323, May 1993	3/31/03	Compliant implementation of environmental regulations
III-1.42: Update guide on Closure of Hazardous and Mixed Waste Management Units at DOE Facilities, DOE/EGC(RCRA)-002/0690, June 1990	3/31/03	Compliant implementation of environmental regulations
III-1.43: Update General Facility Standard Requirements guide, DOE/EH-231-043/1294	2 nd Quarter FY 2003	Compliant implementation of environmental regulations
III-1.44: Update Exclusions and Exemptions from RCRA Hazardous Waste Regulations Guide, EH-231-034/0593	3/31/03	Compliant implementation of environmental regulations
III-1.45: Update Small-Scale Treatability Study Sample Exemption guide, EH-231- 002/0191b	1/31/03	Compliant implementation of environmental regulations
III-1.46: Update guide on Ground Water Remediation at CERCLA Response Action and RCRA Corrective Action Sites, DOE/EH- 0505, October 1995	Ongoing	Compliant implementation of environmental regulations

III-1.47: Prepare DOE/EPA/DoD PCB Mega Rule Q and A Federal Compendium	2003	Compliant implementation of environmental regulations
III-1.48: Prepare EPA PCB Spill Clean-up Policy; DOE Interpretive Guide	2003	Compliant implementation of environmental regulations
III-1.49: Prepare NPRM TSCA-PCB Reclassification Rule Regulatory Bulletin	2003	Compliant implementation of environmental regulations
III-1.50: Prepare TSCA-PCB Exemptions From the Prohibitions Against Manufacturing, Processing, and Distribution in Commerce Regulatory Bulletin	4 th Quarter FY 2003	Compliant environmental peformance
III-1.51: Prepare Concept Paper on DOE Participation in EPA National Environmental Performance Track	12/31/02 (draft)	Compliant environmental performance
III-1.52: Prepare Fact Sheet on EPA National Compliance Assistance Clearinghouse	Periodic, as requested	Fact Sheet-EPA's Compliance Assistance Program
III-1.53: Prepare EPCRA TRI Revisions to Otherwise Use Activity Exemptions Regulatory Bulletin	As needed	Improved understanding of environmental requirements
III-1.54: Update RQ Calculator	October 2002	Improved compliance with hazardous spills regulations
III-1.55: Prepare Radioactively Contaminated Cd/Hg/Ag Battery Treatment Variance Regulatory Bulletin	2 nd Quarter FY 2003	Compliant implementation of environmental regulations

GOAL IV. Establish protective standards for radiation protection of the public and the environment and guidance for meeting these requirements

Objectives:

Objective IV-1. Update Order DOE 5400.5 - Radiation Protection of the Public and the Environment

Strategies	Due Date	Expected Outcome
IV-1.1 Prepare white paper on the need for a revised order or rule.	Feb. 2003	Provide information for a decision on determining a path forward to streamline radiation protection requirements.
IV-1.2 Develop and implement path forward on need for a revised order and a decision on the status of 10 CFR Part 834	March 2003	EH management decision on whether to proceed with order or rule to streamline DOE radiation protection requirements
IV-1.3 Prepare a draft revised Order DOE 5400.5 or rule for internal EH-4 review, based on EH-1 direction	Sept. 2003	Improved radiation protection performance
IV-1.4 Reconvene Environmental Radiological Control Coordinating Committee (ERCCC) to assist in revising DOE 5400.5/DOE 441.XX	April 2003	Improved radiation protection performance
IV-1.5 Prepare/revise guidance on implementing revised DOE 5400.5	TBD	Improved radiation protection performance
IV-1.6 Issue guidance on human radiation dose assessment	July 2003	Improved radiation protection performance
IV-1.7 Issue guidance on consumption of game from DOE sites	May 2003	Improved radiation protection performance
IV-1.8 Conduct analysis regarding "Plans for Plans" item, "De Minimis Radiation Protection Standards" and make recommendations to EH-1	January 2003	Potential for improved radiation protection cost-effectiveness

Objective IV-2. Resolve issue regarding the 25 mrem per year and ALARA vs. 10^{-4} to 10^{-6} lifetime risk

Strategies	Due Date	Expected Outcome
IV-2.1: Support Development of ISCORS Executive Policy Committee	March 2003	Harmonized radiation protection requirements.

IV-2.2: Participate in ISCORS Federal Guidance Subcommittee to assure Federal agency adoption of revised Federal Guidance.	Ongoing	Harmonized radiation protection requirements
IV-2.3: Prepare fact sheet for general distribution comparing risk-based verses dose based standards	2003	Harmonized radiation protection requirements
IV-2.4: Publish articles in journals, professional society news letters, etc. re: comparing risk-based verses dose based standards	Periodically	Harmonized radiation protection requirements
IV-2.5 Prepare a white paper/briefing for EH-1 on the benefits/potential concerns to DOE of a dose-based and a risk-based standard to support ISCORS Executive Committee activities	2003	Harmonized radiation protection requirements
IV-2.6 Prepare responses to the DNFSB comments on the draft DOE ALARA Standard (Vol.1) and work to revise and finalize the document.	2003	Improved radiation protection performance
IV-2.7 Revise and distribute draft DOE ALARA Standard – Case Studies (Vol. 2) to ERCCC for review and comment.	2003	Improved radiation protection performance

Objective IV-3. Resolve issues regarding all pathways vs. separate groundwater standards and the application of drinking water standards to groundwater protection

Strategies	Due Date	Expected Outcome
IV-3.1 Prepare white paper that articulates DOE's position on ground water protection, contrasts to EPA's position, and recommends a path forward for DOE and EPA in support of Strategy # IV-2.1 (the ISCORS Executive Policy Committee)	2003	Harmonized radiation protection requirements

IV-3.2 Prepare EH-1 briefing on issues involved in resolving differences with EPA in support of Strategy # IV-2.1 (the ISCORS Executive Policy Committee)	2003	Harmonized radiation protection requirements
IV-3.3 Catalog decisions on ground water standards at actual DOE sites and compare to actual or expected ground water usage at those sites	TBD	Harmonized radiation protection requirements

Objective IV-4. Address issues involving waste incidental to reprocessing and alternative disposal options for HLW and TRU waste

Strategies	Due Date	Expected Outcome
IV-4.1: Continue to work with EM and the Office of General Counsel to encourage effective use of alternatives	Ongoing	Cost-effective and compliant waste disposal
IV-4.2: Issue fact sheet that identifies waste disposal alternatives, and emphasizes the need to proceed in a deliberate and compliant fashion	May 2003	Improved understanding of environmental requirements
IV-4.3: Conduct analysis regarding "De Minimis Radiation Protection Standards" and make recommendations to EH-1	January 2003	Improved radiation protection cost-effectiveness
IV-4.4: Conduct analysis regarding "Plans for Plans" item, "Risk-Based Decision Making for Cleanup and Waste Management"	9/30/03	Improved understanding of environmental requirements

Objective IV-5. Promote the safe and compliant management, release, and recycling of materials containing residual radioactivity.

Strategies	Due Date	Expected Outcome
IV-5.1: Develop policy and guidance for implementing protective standards for the management of scrap metals.	PEIS	Protective standards and guidance consistent with PEIS decision

IV-5.2: Resolve comments provided by DOE programs and sites regarding the Guide for Control and Release of Property Containing Residual Radioactivity (issued in April 2002 for use and comment). Revise the Guide as needed and issue as final.	Ongoing. Final Guide planned for June 2003.	Guidance on how to establish protective radiation control and release limits. Improved radiation protection performance.
IV-5.3: Support international development of clearance standards that work in U.S.	Ongoing	Provide international community with insights from DOE experiences. Ensure DOE and US interests are considered in development of internal standards.
IV-5.4: Work with EM and others to prepare fact sheets that can be used to better explain issues relating to the management, release and recycling of materials containing residual radioactivity	2003	Better informed public and proactive technical background information for media.
IV-5.5: Prepare an analysis of National Academy of Sciences (NAS) and National Council on Radiation Protection and Measurements (NCRP) recommendations when issued to support DOE decisions	Following issuance of NCRP report	Analysis of NAS/NCRP recommendations and their implications for DOE policies.

Objective IV-6. Address under-utilization of DOE disposal facilities

Strategies	Due Date	Expected Outcome
IV-6.1: Prepare a summary of information (lessons learned and root causes) from reviewing the last two years of exemptions	2 nd Quarter FY 2003	Shared lessons learned
IV-6.2: Distribute lessons learned summary document throughout DOE to ask for solutions and reasons for problems	3 rd Quarter FY 2003	Shared lessons learned

<u>GOAL V.</u> Represent and advocate DOE's interests in interagency, national and international environmental forums

Objectives:

Objective V-1. Represent DOE on Interagency Committees, Workgroups, etc.

Strategies	Due Date	Expected Outcome
V-1.1: Represent DOE on the Interagency Steering Committee on Radiation Standards (ISCORS)	Ongoing	Representation of DOE's position to other agencies and work to improve harmonized radiation protection requirements.
V-1.2: Chair ISCORS Mixed Waste Subcommittee	Ongoing	Lead and contribute to interagency discussions on MW issues
V-1.3: Chair ISCORS Risk Harmonization Subcommittee	Ongoing	Represent DOE's position to other organizations and improve harmonized radiation protection requirements.
V-1.4: Participate in the development of Optimization and Institutional Controls documents in support of ad hoc working groups of the ISCORS Risk Harmonization Subcommittee.	Dec. 2003	Harmonized radiation protection requirements.
V-1.5: Review the Interstate Technology and Regulatory Council (ITRC) report, titled "Determining Cleanup Goals at Radioactively Contaminated Sites: Case Studies."	Dec. 2003	Improved understanding of chemical and radiological harmonization efforts.
V-1.6: Develop a paper to compare and contrast the ITRC Case Studies report and the ELI/Johns Hopkins Report, titled "Chemical and Radiation Environmental Risk Management at the Crossroads: Case Studies".	2003	Improved understanding of chemical and radiological harmonization efforts.
V-1.7: Co-chair ISCORS Federal Guidance Subcommittee	Ongoing.	Representation of DOE's position to other organizations.

V-1.8: Participate in ISCORS Cleanup Subcommittee	Ongoing.	Representation of DOE's position to other organizations.
V-1.9: Participate in ISCORS Sewage Sludge Dose Subcommittee	Ongoing	Representation of DOE's position to other organizations
V-1.10: Participate in ISCORS Recycle Subcommittee	Ongoing	Harmonized radiation protection requirements
V-1.11: Establish and lead the inter-agency ECORAD work group on radiological protection of the environment.	Ongoing	Representation of DOE's position to other organizations.
		Harmonized approaches and tools for radiological ecological risk assessment.
		Improved coordination and development of consensus-based positions on national and international policy and approaches for radiation protection of the environment.
V-1.12: Represent DOE on the Interagency Work Group on Migratory Birds	Ongoing	Representation of DOE's position to other agencies
		Updated information on new issues and legislation pertaining to migratory bird protection and conservation.
V-1.13: Represent DOE on the Federal Interagency Committee for the Mgt. of Noxious and Exotic Weeds	Ongoing	Representation of DOE's position to other agencies
		Updated information on new issues and legislation pertaining to invasive species.

V-1.14: Serve as Headquarters liaison for Endangered and Threatened Species information	Ongoing	Representation of DOE's position to other agencies Updated information on new issues and legislation pertaining to Federally endangered and threatened species.
V-1.15: Serve as Headquarters liaison for Amphibian Declines and Deformities	Ongoing	Representation of DOE's position to other agencies Updated information on advances in identifying causes of amphibian declines and deformities and their effects on biodiversity.
V-1.16: Participate in the American National Standards Institute Registration Accreditation Board for EMSs	Ongoing	Provide US government representation
V-1.17: Represent DOE on the Federal Environmental Management Systems Work Group	Ongoing	Representation of DOE's position to other agencies Share Lessons Learned
V-1.18: Represent DOE on the Federal Watershed Management Team proposing ways to implement a unified Federal policy for management of Federal lands using a watershed approach	As necessary	Representation of DOE's position to other agencies
V-1.19: Represent DOE on an interagency task for review of existing National Primary Drinking Water Regulations.	Ongoing	Representation of DOE's position to other agencies
V-1.20: Represent DOE as resource person on CRCPD E-5 committee	As requested	Representation of DOE's position to other agencies

V-1.21: Participate in Multi-agency Radiological Laboratory Analytical Protocols Manual (MARLAP) working group	Ongoing	Representation of DOE's position to other organization Cost savings by ensuring collection of data that meet program's data quality objectives
V-1.22: Participate in Intergovernmental Data Quality Task Force (IDQTF)	Ongoing	Representation of DOE's position to other organization Enhanced accountability and confidence in environmental decisions. Cost savings
V-1.23: Represent EH on interagency committees and activities related to ground water protection	Ongoing	Representation of DOE's position to other organizations
V-1.24: Participate in DoD's Clean Air Act Services Steering Committee	Ongoing	Representation of DOE's position to other organizations
V-1.25: Participate in FEMA-led Disaster Help Portal development work group.	Ongoing	Support national defense and emergency preparedness efforts.
V-1.26: Provide support to the Department of State on radiobiological issues related to the republic of the Marshall Islands.	Ongoing	Provision of technical expertise to other agencies.
V-1.27: Serve as DOE liaison with the U.S. Forest Service on proposed forestry issues workshop.	Ongoing	Representation of DOE position to other agencies.

V-1.28: Participate in Multi-agency Radiological Surveys and Site Investigation Committee.(MARSSIM)	Ongoing	Representation of DOE's Position to other organization Resource savings by providing consistent approach to conducting radiation surveys that is acceptable to Federal agencies
V-1.29: Serve as Chairman of the General Environmental Engineering Sub-committee of the American Academy of Environmental Engineers	Ongoing	Representation of DOE's technical expertise to other organizations
V-1.30: EPA National Environmental Performance Track support	Ongoing	Representation of DOE's position to other organizations
V-1.31: Serve as DOE Liaison to EFCOG EMS Subgroup to the ISM Workgroup	Ongoing	Representation of DOE's position to other organizations
V-1.32: Represent DOE on the DOE-DoD Workgroup on Land Use and Institutional Controls	Ongoing	Shared Lessons Learned
V-1.33: Participate in EPA Workgroup on Ecological Soil Screening Levels (Chair Eco Exposure Modeling Sub.)	9/30/03	Eco Soil Screening Levels Guidance
V-1.34: Chair NR Trustee Coordinator's Steering Committee Federal Natural Resource Trustee Advisory Group	Ongoing	Complex-wide NRDA Coordination
V-1.35: Represent DOE on Interagency CERCLA Closure/5-Year Review Workgroup	Ongoing	Coordinate/Develop consistent policy with EPA and other Federal Facilities
V-1.36: Represent EH on an e-government effort to make environmental laws and regulations accessible	Ongoing	Improved access to environmental laws and regulations

V-1.37: Participate in EPA/DOE Technical Work Group on Mercury Mixed-Waste Treatment	Ongoing	Representation of DOE's position to other organizations
V-1.38: Participate in EPA/DOE Technical Work Group on Mixed Waste Macroencapsulation Treatment	Ongoing	Representation of DOE's position to other organizations
V-1.39: Participate in EPA/DOE MOU re: Mixed Waste Treatment Core Management Team	Ongoing	Representation of DOE/EH position to other organizations
V-1:40: Participate in DOE/EPA/State Workgroup on Development of Standardized Containers for Macroencapusulating DOE Hazardous Debris	Ongoing	Representation of DOE/EH position to other organizations
V-1.41: Participate in Federal Facilities Task Force Executive Order (EO) 13148 on priority chemical identification targets for reduction in use/release	Quarterly	Focused attention on selected materials for special handling at the sites
V-1.42: Serve as DOE Representative EO 13148 Interagency Environmental Leadership Workgroup	Quarterly	Development of effective and efficient Federal pollution prevention program
		Representation of DOE position to other agencies
V-1.43: Participate in EPA TSCA Persistent Bioaccumulative and Toxic Pollutants (PBT)- PCB National Action Plan Work Group	Ongoing	Representation of DOE's position to other organizations
V-1.44: Support EPA Federal Facility Leadership Council	Ongoing	Representation of DOE's position to EPA and other agencies and work to accelerate cleanup regulatory processes
V-1.45: Participate in Interstate Technology Regulatory Cooperative (ITRC) Member to the Integrated IT Management Working Group	Ongoing	Representation of DOE's position to ITRC members including, DoD and EPA work to accelerate cleanup regulatory processes

V-1.46: Participate in OMB Data Quality Guidelines/Risk Assessment Work Group	12/31/02	Development of Federal Data Quality Guidelines
V-1.47: Participate in NAS Risk Information Dissemination Panel	12/31/02	Development of Federal Data Quality Guidelines
V-1.48: Participate in Interagency Steering Committee on CERCLA Post-construction Completion Issues	Ongoing	Implementation of OMB Data Quality Guidelines
V-1.49: Participate in Interagency Military Land Use Coordination Committee	Ongoing	Representation of DOE's position to other organizations
V-1.50: Participate in EO 13148 Interagency EMS Performance Metrics Workgroup	Ongoing	Representation of DOE's position to other organizations (Proposals for effective and cost-effective implementation of EO requirements)
V-1.51: Participate in Interagency Work Group of the "Buy Bio" Program	Monthly	Shared Lessons Learned Compliant environmental performance
V-1.52: Participate in Federal Environmental Executive Workgroup on RCRA Section 6002 Burden Reduction	Periodic	Efficiency in reporting commensurate with important information preservation
V-1.53: Participate in EPA/Interagency Comprehensive Procurement Guidelines Workgroup	Monthly	Shared Lesson Learned Compliant environmental performance
V-1.54: Participate in Executive Order 13101 Interagency Advisory Group	Monthly	Representation of DOE interests in APP program planning and implementation

Objective V-2. Represent U.S. on International Committees, Working Groups, etc.

Strategies	Due Date	Expected Outcome
V-2.1: Represent U.S. on International Atomic Energy Agency (IAEA) Committees, Advisory Committees and Working Groups	Ongoing	Representation of DOE and US positions
V-2.2: Represent DOE and the U.S. as Corresponding Member of the ICRP Task Group on Protection of the Environment.	Ongoing	Representation of DOE and US positions
V-2.3: Represent DOE on the scientific and organizing committee for the Third International Symposium on the Protection of the Environment from Ionizing Radiation	April 2003 Final Symposium Proceedings and Workshop Summary Reports	Representation of DOE and US positions
V-2.4 Participate on U.S. Technical Advisory Group to the International Organization for Standards Technical Committee 207 (EMS)	Ongoing	Representation of DOE and US positions.
V-2.5: Participate in IAEA Specialists' Meetings and Conferences on Radiation Protection of the Environment.	Ongoing as needed. October 2003 Conference participation	Representation of DOE and US positions
V-2.6: Participate in and provide comments to the Nuclear Energy Agency (NEA) regarding interpretation and comment on ICRP's proposed framework for radiation protection of the environment.	Ongoing as needed	Representation of DOE and US positions

GOAL VI. Develop and issue policies, directives and guides related to DOE's responsibilities to protect its natural and cultural resources

Objectives:

Objective VI-1. Replace DOE Order 5400.1 with Order 450.1

Strategies	Due Date	Expected Outcome
VI-1.1: Issue Draft Order 450.1 and Resolve Comments	December 2002	Issuance of environmentally sound, performance-based DOE requirements
VI-1.2: Issue Final Order	December 2002	Issuance of environmentally sound, performance-based DOE requirements
VI-1.3: Prepare accompanying guides to the Order	2003	Issuance of environmentally sound, performance-based DOE guidance and technical standards

Objective VI-2. Issue Institutional Controls Policy

Strategies	Due Date	Expected Outcome
VI-2.1: Resolve comments received through the Field Management Council process	January 2003	Issuance of environmentally sound, performance-based DOE policy
VI-2.2: Issue final DOE policy P454.1	February 2003	Issuance of environmentally sound, performance-based DOE policy

Objective VI-3. Issue needed guidance

Strategies	Due Date	Expected Outcome
VI-3.1: Revise "Environmental Guidelines for the Development of Cultural Resource Management Plans"	February 2003	Issuance of environmentally sound, performance-based DOE guidance and technical standards

VI-3.2: Issue guidance regarding tribal consultation that will expand on/fill in gaps of the implementation of the DOE Indian Policy and executive order on tribal consultation which will impact DOE's Cultural Resources Management program	May 2003	Issuance of environmentally sound, performance-based DOE guidance and technical standards
VI-3.3: Develop ground water surveillance monitoring implementation guidance	June 2003	Issuance of environmentally sound, performance-based DOE guidance and technical standards
VI-3.4: Issue guidance re: Implementation of water resource protection requirements of Order DOE 5400.5	June 2003	Issuance of environmentally sound, performance-based DOE guidance and technical standards
VI-3.5: Prepare and issue guidance on preparation of a supplement to the Migratory Bird Protection MOU	Pending. Guidance will be issued within 30 days after MOU is signed.	Development of site-specific supplements to MOU
VI-3.6: Prepare and issue guidance on Wildland Fire Management	2003	Issuance of environmentally sound guidance to help DOE elements implement DOE's Wildland Fire Management Policy
VI-3.7: Issue implementation guidance for DOE Policy 141.1, "DOE Management of Cultural Resources" and revised Indian Policy	August 2003	Issuance of environmentally sound, performance-based DOE guidance and technical standards

VI-3.8: Issue Annual guidance for preparation of DOE Annual Site Environmental Reports (ASERs) pursuant to DOE	January, 2003	Improved compliance with environmental standards and requirements.
231.1		Improved compliance with radiation protection requirements of Order DOE 5400.5.
		Improved quality of ASERs across the DOE complex.